

INDEX #: 7:25-CV-00064-PMH

DATE FILED: 5/13/2025

ATTORNEY: COHEN &amp; GREEN P.L.L.C.

1639 CENTRE STREET SUITE 216 RIDGEWOOD NY 11385 (929)888-9480

UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK

MARISOL ORDONEZ VARGAS,

Plaintiff(s)

- against -

ORANGE COUNTY, ET AL

Defendant(s)

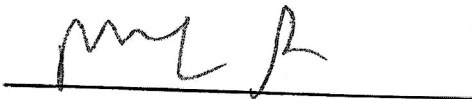
STATE OF NEW YORK:

COUNTY OF ALBANY: ss:

STEF MARIE, BEING DULY SWORN DEPOSES AND SAYS DEPONENT IS NOT A PARTY TO THIS ACTION AND IS OVER THE AGE OF EIGHTEEN YEARS AND RESIDES IN THE STATE OF NEW YORK.

That on 06/02/2025, 03:31PM at 99 WASHINGTON AVENUE, 6TH FLOOR, ALBANY, NEW YORK 12231, deponent served a **SUMMONS IN A CIVIL ACTION AND COMPLAINT** upon **NEW YORK CORRECT CARE SOLUTIONS MEDICAL SERVICES, P.C.**, a defendant in the above captioned matter.Deponent served **NANCY EARLEY**, a person authorized by the **NEW YORK Secretary of State** to accept service of process, with **2 copies** of the above described papers and the statutory fee of **\$40.00** pursuant to section **306B** of the **NY BUSINESS CORPORATION LAW**.

DEPONENT DESCRIBES THE INDIVIDUAL SERVED AS FOLLOWS:

Perceived Gender **F** Approximate age **53** Approximate height **5'06"** Approximate weight **145** Perceived Race **WHITE**  
Color of hair **BROWN**Sworn to before me on 06/03/2025  
DAVID POST NO. 01P06427868  
NOTARY PUBLIC, STATE OF NEW YORK  
QUALIFIED IN ALBANY COUNTY  
COMMISSION EXPIRES ON 01/03/2026  
STEF MARIE

COMPLIANT PROCESS SERVICE INC

2648 MONTAUK AVENUE MERRICK, NY 11566 (516)967-5246

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

MARISOL ORDONEZ VARGAS,

Plaintiff(s),

Case No.: 7:25-cv-00064

-against-

ORANGE COUNTY, ET AL.,

Defendant(s).

## AFFIDAVIT OF SERVICE

STATE OF NEW YORK, COUNTY OF PUTNAM: SS:

Najir Williams, being duly sworn, deposes and states that deponent is not a party herein, is over 18 years of age and resides in the State of New York. On May 15, 2025 at 12:43 pm at 255 Main Street, Goshen, NY 10924 deponent served the within:

<input checked="" type="checkbox"/> SUMMONS IN A CIVIL ACTION	<input checked="" type="checkbox"/> COMPLAINT	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

on ORANGE COUNTY, defendant.

☐ Individual: By delivering a true copy of the same to the defendant personally; and deponent knew the person so served to be the person described as said defendant.

☐ Suitable Age Person: By delivering at the above address a true copy of the same to \_\_\_\_\_, a person who is of suitable age and discretion. Said premises is: ☐ the actual place of business abode or ☐ dwelling house or usual place of abode, within this state, and by

☐ Corporation: A domestic/municipal corporation by delivering thereat a true copy of same to Virginia Esposito personally, and deponent knew said corporation so served to be the corporation described in same and knew said individual to be Confidential Secretary thereof.

☐ Mailing: Deponent also enclosed a true copy of the same in a post-paid sealed envelope marked personal and confidential properly addressed to the above named at the above address by First Class Mail in a post office or official depository under the exclusive care of the United States Postal Service within the time allowed by law.

Description: The person referred to is described as follows:

<input type="checkbox"/> Male	<input checked="" type="checkbox"/> White Skin	<input type="checkbox"/> Black Hair	<input type="checkbox"/> 14-20 Yrs	<input type="checkbox"/> Under 5'3"	<input type="checkbox"/> Under 100 Lbs.
<input checked="" type="checkbox"/> Female	<input type="checkbox"/> Black Skin	<input type="checkbox"/> Brown Hair	<input type="checkbox"/> 21-35 Yrs	<input checked="" type="checkbox"/> 5'4"-5'8"	<input type="checkbox"/> 100-130 Lbs.
	<input type="checkbox"/> Brown Skin	<input checked="" type="checkbox"/> Blonde Hair	<input type="checkbox"/> 36 -50 Yrs.	<input type="checkbox"/> 5'9"-6'	<input checked="" type="checkbox"/> 131-160 Lbs.
	<input type="checkbox"/> Yellow Skin	<input checked="" type="checkbox"/> Gray Hair	<input checked="" type="checkbox"/> 51-65 Yrs.	<input type="checkbox"/> Over 6'	<input type="checkbox"/> 161- 200 Lbs.
	<input type="checkbox"/> Red Skin	<input type="checkbox"/> Red Hair	<input type="checkbox"/> Over 65 Yrs.		<input type="checkbox"/> Over 200 Lbs.
	<input type="checkbox"/> Tan Skin	<input type="checkbox"/> White Hair			
		<input type="checkbox"/> Bald			<input checked="" type="checkbox"/> Glasses

☒ Other Identifying Features: Person served verbally confirmed she was authorized to accept on the County's behalf.

☒ Index Number/Date of Filing Endorsement \_\_\_\_\_

☐ Military Service: Upon information and belief I aver that the recipient is not in military services of New York State or of the United States as that term is defined in either the State or Federal Statutes.

I affirm this 20th day of May, 2025, under the penalties of perjury under the laws of New York, which may include a fine or imprisonment, that the foregoing is true, and I understand that this document may be filed in an action or proceeding in a court of law.

*Najir Williams*  
Najir Williams - Process Server  
Compliant Process Service  
COHEN & GREEN P.L.L.C.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

MARISOL ORDONEZ VARGAS,

Plaintiff(s),

Case No.: 7:25-cv-00064

-against-

ORANGE COUNTY, ET AL.,

Defendant(s).

## AFFIDAVIT OF SERVICE

STATE OF NEW YORK, COUNTY OF PUTNAM: SS:

Najir Williams, being duly sworn, deposes and states that deponent is not a party herein, is over 18 years of age and resides in the State of New York. On May 15, 2025 at 12:20 pm at 110 Wells Farm Road, Goshen, NY 10924 deponent served the within:

<input checked="" type="checkbox"/> X SUMMONS IN A CIVIL ACTION	<input checked="" type="checkbox"/> X COMPLAINT	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

on TENESHIA WASHINGTON, RN % ORANGE COUNTY CORRECTIONAL FACILITY, defendant.

☐ Individual: By delivering a true copy of the same to the defendant personally; and deponent knew the person so served to be the person described as said defendant.

☒ Suitable Age Person: By delivering at the above address a true copy of the same to Melissa Lukes, Health Services Administrator, a person who is of suitable age and discretion. Said premises is: ☐ the actual place of business abode or dwelling house or usual place of abode, within this state, and by

☒ Mailing: Deponent also enclosed a true copy of the same in a post-paid sealed envelope marked personal and confidential properly addressed to the above named at the above address by First Class Mail in a post office or official depository under the exclusive care of the United States Postal Service within the time allowed by law.

Description: The person referred to is described as follows:

<input type="checkbox"/> Male	<input type="checkbox"/> White Skin	<input type="checkbox"/> Black Hair	<input type="checkbox"/> 14-20 Yrs	<input type="checkbox"/> Under 5'3"	<input type="checkbox"/> Under 100 Lbs.
<input checked="" type="checkbox"/> Female	<input type="checkbox"/> Black Skin	<input checked="" type="checkbox"/> Brown Hair	<input type="checkbox"/> 21-35 Yrs	<input checked="" type="checkbox"/> 5'4"-5'8"	<input type="checkbox"/> 100-130 Lbs.
	<input type="checkbox"/> Brown Skin	<input type="checkbox"/> Blonde Hair	<input checked="" type="checkbox"/> 36-50 Yrs.	<input type="checkbox"/> 5'9"-6'	<input checked="" type="checkbox"/> 131-160 Lbs.
	<input type="checkbox"/> Yellow Skin	<input type="checkbox"/> Gray Hair	<input type="checkbox"/> 51-65 Yrs.	<input type="checkbox"/> Over 6'	<input type="checkbox"/> 161-200 Lbs.
	<input type="checkbox"/> Red Skin	<input type="checkbox"/> Red Hair	<input type="checkbox"/> Over 65 Yrs.		<input type="checkbox"/> Over 200 Lbs.
	<input checked="" type="checkbox"/> Tan Skin	<input type="checkbox"/> White Hair			
		<input type="checkbox"/> Bald			<input type="checkbox"/> Glasses

☒ Other Identifying Features: Person served verbally confirmed she was authorized to accept on the Defendant's behalf.

☒ Index Number/Date of Filing Endorsement \_\_\_\_\_

☒ Military Service: Upon information and belief I aver that the recipient is not in military services of New York State or of the United States as that term is defined in either the State or Federal Statutes.

I affirm this 20th day of May, 2025, under the penalties of perjury under the laws of New York, which may include a fine or imprisonment, that the foregoing is true, and I understand that this document may be filed in an action or proceeding in a court of law.

*Najir Williams*  
Najir Williams - Process Server  
Compliant Process Service  
COHEN & GREEN P.L.L.C.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
MARISOL ORDONEZ VARGAS,

Plaintiff(s),

Case No.: 7:25-cv-00064

-against-

ORANGE COUNTY, ET AL.,

Defendant(s).  
-----X

**AFFIDAVIT OF SERVICE**

STATE OF NEW YORK, COUNTY OF PUTNAM: SS:

Najir Williams, being duly sworn, deposes and states that deponent is not a party herein, is over 18 years of age and resides in the State of New York. On May 15, 2025 at 12:20 pm at 110 Wells Farm Road, Goshen, NY 10924 deponent served the within:

<input checked="" type="checkbox"/> X SUMMONS IN A CIVIL ACTION	<input checked="" type="checkbox"/> X COMPLAINT	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

on JILLIAN BARONE, RN % ORANGE COUNTY CORRECTIONAL FACILITY, defendant.

☐ Individual: By delivering a true copy of the same to the defendant personally; and deponent knew the person so served to be the person described as said defendant.

☒ Suitable Age Person: By delivering at the above address a true copy of the same to Melissa Lukes, Health Services Administrator, a person who is of suitable age and discretion. Said premises is: ☐ the actual place of business abode or dwelling house or usual place of abode, within this state, and by

☐ Mailing: Deponent also enclosed a true copy of the same in a post-paid sealed envelope marked personal and confidential properly addressed to the above named at the above address by First Class Mail in a post office or official depository under the exclusive care of the United States Postal Service within the time allowed by law.

Description: The person referred to is described as follows:

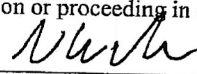
<input type="checkbox"/> Male	<input type="checkbox"/> White Skin	<input type="checkbox"/> Black Hair	<input type="checkbox"/> 14-20 Yrs	<input type="checkbox"/> Under 5'3"	<input type="checkbox"/> Under 100 Lbs.
<input checked="" type="checkbox"/> Female	<input type="checkbox"/> Black Skin	<input checked="" type="checkbox"/> Brown Hair	<input type="checkbox"/> 21-35 Yrs	<input checked="" type="checkbox"/> 5'4"-5'8"	<input type="checkbox"/> 100-130 Lbs.
	<input type="checkbox"/> Brown Skin	<input type="checkbox"/> Blonde Hair	<input checked="" type="checkbox"/> 36 -50 Yrs.	<input type="checkbox"/> 5'9"-6'	<input checked="" type="checkbox"/> 131-160 Lbs.
	<input type="checkbox"/> Yellow Skin	<input type="checkbox"/> Gray Hair	<input type="checkbox"/> 51-65 Yrs.	<input type="checkbox"/> Over 6'	<input type="checkbox"/> 161- 200 Lbs.
	<input type="checkbox"/> Red Skin	<input type="checkbox"/> Red Hair	<input type="checkbox"/> Over 65 Yrs.		<input type="checkbox"/> Over 200 Lbs.
	<input checked="" type="checkbox"/> Tan Skin	<input type="checkbox"/> White Hair			
		<input type="checkbox"/> Bald			<input type="checkbox"/> Glasses

☒ Other Identifying Features: Person served verbally confirmed she was authorized to accept on the Defendant's behalf.

☒ Index Number/Date of Filing Endorsement

☒ Military Service: Upon information and belief I aver that the recipient is not in military services of New York State or of the United States as that term is defined in either the State or Federal Statutes.

I affirm this 20th day of May, 2025, under the penalties of perjury under the laws of New York, which may include a fine or imprisonment, that the foregoing is true, and I understand that this document may be filed in an action or proceeding in a court of law.

  
Najir Williams - Process Server  
Compliant Process Service  
COHEN & GREEN P.L.L.C.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

MARISOL ORDONEZ VARGAS,

Plaintiff(s),

Case No.: 7:25-cv-00064

-against-

ORANGE COUNTY, ET AL.,

Defendant(s).

## AFFIDAVIT OF ATTEMPTED SERVICE

STATE OF NEW YORK, COUNTY OF PUTNAM: SS:

Najir Williams, being duly sworn, deposes and states that deponent is not a party herein, is over 18 years of age and resides in the State of New York. On May 15, 2025 at 12:20 pm at 110 Wells Farm Road, Goshen, NY 10924 deponent attempted to serve the within:

<input checked="" type="checkbox"/> SUMMONS IN A CIVIL ACTION	<input checked="" type="checkbox"/> COMPLAINT	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

on JOSEPH PATRICK HARKINS % ORANGE COUNTY CORRECTIONAL FACILITY, defendant.

☐ Individual: By delivering a true copy of the same to the defendant personally; and deponent knew the person so served to be the person described as said defendant.

☐ Suitable Age Person: By delivering at the above address a true copy of the same to Melissa Lukes, Health Services Administrator, a person who is of suitable age and discretion. Said premises is: ☐ the actual place of business abode or dwelling house or usual place of abode, within this state, and by

☒ Mailing: Deponent also enclosed a true copy of the same in a post-paid sealed envelope marked personal and confidential properly addressed to the above named at the above address by First Class Mail in a post office or official depository under the exclusive care of the United States Postal Service within the time allowed by law.

Attempted Service: Refused stating "that person does not work here" "I don't know them".

Description: The person referred to is described as follows:

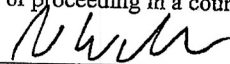
<input type="checkbox"/> Male	<input type="checkbox"/> White Skin	<input type="checkbox"/> Black Hair	<input type="checkbox"/> 14-20 Yrs	<input type="checkbox"/> Under 5'3"	<input type="checkbox"/> Under 100 Lbs.
<input type="checkbox"/> Female	<input type="checkbox"/> Black Skin	<input type="checkbox"/> Brown Hair	<input type="checkbox"/> 21-35 Yrs	<input type="checkbox"/> 5'4"-5'8"	<input type="checkbox"/> 100-130 Lbs.
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	<input type="checkbox"/> Tan Skin	<input type="checkbox"/> White Hair			
		<input type="checkbox"/> Bald			<input type="checkbox"/> Glasses

☐ Other Identifying Features: \_\_\_\_\_

☒ Index Number/Date of Filing Endorsement \_\_\_\_\_

☐ Military Service: Upon information and belief I aver that the recipient is not in military services of New York State or of the United States as that term is defined in either the State or Federal Statutes.

I affirm this 20th day of May, 2025, under the penalties of perjury under the laws of New York, which may include a fine or imprisonment, that the foregoing is true, and I understand that this document may be filed in an action or proceeding in a court of law.

  
Najir Williams - Process Server  
Compliant Process Service  
COHEN & GREEN P.L.L.C.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
**MARISOL ORDONEZ VARGAS,**

Plaintiff(s),

Case No.: 7:25-cv-00064

-against-

**ORANGE COUNTY, ET AL.,**

Defendant(s).  
-----X

**AFFIDAVIT OF ATTEMPTED SERVICE**

STATE OF NEW YORK, COUNTY OF PUTNAM: SS:

Najir Williams, being duly sworn, deposes and states that deponent is not a party herein, is over 18 years of age and resides in the State of New York. On May 15, 2025 at 12:20 pm at 110 Wells Farm Road, Goshen, NY 10924 deponent attempted to serve the within:

<input checked="" type="checkbox"/> X SUMMONS IN A CIVIL ACTION	<input checked="" type="checkbox"/> X COMPLAINT	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

on MANDILEE ZACCAGNINO, NP % ORANGE COUNTY CORRECTIONAL FACILITY, defendant.

☐ Individual: By delivering a true copy of the same to the defendant personally; and deponent knew the person so served to be the person described as said defendant.

☐ Suitable Age Person: By delivering at the above address a true copy of the same to Melissa Lukes, Health Services Administrator, a person who is of suitable age and discretion. Said premises is: ☐ the actual place of business abode or dwelling house or usual place of abode, within this state, and by

☒ Mailing: Deponent also enclosed a true copy of the same in a post-paid sealed envelope marked personal and confidential properly addressed to the above named at the above address by First Class Mail in a post office or official depository under the exclusive care of the United States Postal Service within the time allowed by law.

Attempted Service: Refused stating "that person does not work here" "I don't know them".

Description: The person referred to is described as follows:

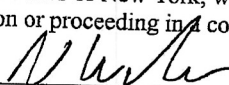
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	<input type="checkbox"/> Tan Skin	<input type="checkbox"/> White Hair			
		<input type="checkbox"/> Bald			<input type="checkbox"/> Glasses

☐ Other Identifying Features: \_\_\_\_\_

☒ Index Number/Date of Filing Endorsement \_\_\_\_\_

☐ Military Service: Upon information and belief I aver that the recipient is not in military services of New York State or of the United States as that term is defined in either the State or Federal Statutes.

I affirm this 20th day of May, 2025, under the penalties of perjury under the laws of New York, which may include a fine or imprisonment, that the foregoing is true, and I understand that this document may be filed in an action or proceeding in a court of law.

  
Najir Williams - Process Server  
Compliant Process Service  
COHEN & GREEN P.L.L.C.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

MARISOL ORDONEZ VARGAS,

Plaintiff(s),

-against-

Case No.: 7:25-cv-00064

ORANGE COUNTY, ET AL.,

Defendant(s).

## AFFIDAVIT OF ATTEMPTED SERVICE

STATE OF NEW YORK, COUNTY OF PUTNAM: SS:

Najir Williams, being duly sworn, deposes and states that deponent is not a party herein, is over 18 years of age and resides in the State of New York. On May 15, 2025 at 12:20 pm at 110 Wells Farm Road, Goshen, NY 10924 deponent attempted to serve the within:

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<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

on DOMINICK PLACENTE % ORANGE COUNTY CORRECTIONAL FACILITY, defendant.

☐ Individual: By delivering a true copy of the same to the defendant personally; and deponent knew the person so served to be the person described as said defendant.

☐ Suitable Age Person: By delivering at the above address a true copy of the same to Melissa Lukes, Health Services Administrator, a person who is of suitable age and discretion. Said premises is: ☐ the actual place of business abode or dwelling house or usual place of abode, within this state, and by

X Mailing: Deponent also enclosed a true copy of the same in a post-paid sealed envelope marked personal and confidential properly addressed to the above named at the above address by First Class Mail in a post office or official depository under the exclusive care of the United States Postal Service within the time allowed by law.

Attempted Service: Refused stating "that person does not work here" "I don't know them".

Description: The person referred to is described as follows:

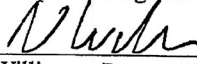
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<input type="checkbox"/> Female	<input type="checkbox"/> Black Skin	<input type="checkbox"/> Brown Hair	<input type="checkbox"/> 21-35 Yrs	<input type="checkbox"/> 5'4"-5'8"	<input type="checkbox"/> 100-130 Lbs.
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	<input type="checkbox"/> Tan Skin	<input type="checkbox"/> White Hair			
		<input type="checkbox"/> Bald			<input type="checkbox"/> Glasses

☐ Other Identifying Features: \_\_\_\_\_

X Index Number/Date of Filing Endorsement \_\_\_\_\_

☐ Military Service: Upon information and belief I aver that the recipient is not in military services of New York State or of the United States as that term is defined in either the State or Federal Statutes.

I affirm this 20th day of May, 2025, under the penalties of perjury under the laws of New York, which may include a fine or imprisonment, that the foregoing is true, and I understand that this document may be filed in an action or proceeding in a court of law.

  
Najir Williams - Process Server  
Compliant Process Service  
COHEN & GREEN P.L.L.C.